

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;  
COMMONWEALTH OF  
MASSACHUSETTS; STATE OF NEW  
JERSEY; STATE OF COLORADO; STATE  
OF ILLINOIS; STATE OF MARYLAND;  
STATE OF NEW YORK; and STATE OF  
WISCONSIN,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;  
DENISE CARTER, in her official capacity as  
former Acting Secretary of Education and  
current acting Chief Operating Officer, Federal  
Student Aid; LINDA MCMAHON, in her  
official capacity as Secretary of Education,

Defendants.

Case No. 1:25-cv-10548

**DECLARATION OF ADELAIDE PAGANO IN SUPPORT OF PLAINTIFFS' MOTION  
FOR TEMPORARY RESTRAINING ORDER**

Adelaide Pagano, an attorney admitted to practice before this Court and admitted to practice before the Courts of Massachusetts, does hereby state the following under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am Adelaide Pagano, Assistant Attorney General in the Office of the Attorney General for the State of Massachusetts, and I appear on behalf of the Commonwealth of Massachusetts in this action.

2. I submit this declaration in support of Plaintiff States' Motion for Temporary Restraining Order, pursuant to Federal Rule of Civil Procedure 65. The facts set forth herein are based upon my personal knowledge and/or a review of the files in my possession.

3. I have attached hereto this declaration, true and correct copies of factual declarations and all exhibits to such declarations, as follows:

4. Attached hereto as Exhibit 1 is the Declaration of Denise Barton, Chief Deputy General Counsel of University of Massachusetts, dated March 4, 2025.

5. Attached hereto as Exhibit 2 is the Declaration of Marisa Olivo, Director of Teacher Pipeline Programs at Boston Public Schools in Massachusetts, dated March 3, 2025.

6. Attached hereto as Exhibit 3 is the Declaration of A. Dee Williams, Professor in the College of Education at California State University, Los Angeles, dated March 3, 2025.

7. Attached hereto as Exhibit 4 is the Declaration of Jennifer Oloff-Lewis, Professor in the College of Communication and Education's School of Education at California State University, Chico, dated March 4, 2025.

8. Attached hereto as Exhibit 5 is the Declaration of Benjamin Seipel, Professor of Education within the School of Education at California State University, Chico, dated March 4, 2025.

9. Attached hereto as Exhibit 6 is the Declaration of Jessica Jensen, Associate Professor in the School of Education at California Polytechnic State University, San Luis Obispo, dated March 5, 2025.

10. Attached hereto as Exhibit 7 is the Declaration of Briana Ronan, Associate Professor in the School of Education at California Polytechnic State University, San Luis Obispo, dated March 5, 2025.

11. Attached hereto as Exhibit 8 is the Declaration of Marcia L. Smith, Associate Vice Chancellor for Research Administration at University of California, Los Angeles, dated March 5, 2025.

12. Attached hereto as Exhibit 9 is the Declaration of Amy Cuhel-Shuckers, Director of Grants and Sponsored Research at The College of New Jersey, dated March 5, 2025.

13. Attached hereto as Exhibit 10 is the Declaration of Jonathan GS Koppell, President of Montclair State University, dated March 5, 2025.

14. Attached hereto as Exhibit 11 is the Declaration of Kenneth Christensen, Chancellor of University of Colorado Denver, dated March 4, 2025.

15. Attached hereto as Exhibit 12 is the Declaration of Edmundo Garcia-Solis, Associate Provost of Grants and Research Administration at Chicago State University, dated March 4, 2025.

16. Attached hereto as Exhibit 13 is the Declaration of Benjamin Felton, Chief Talent Officer at Chicago Public Schools, dated March 5, 2025.

17. Attached hereto as Exhibit 14 is the Declaration of Laurie Mullen, Dean of the College of Education at Townson University, dated March 4, 2025.

18. Attached hereto as Exhibit 15 is the Declaration of Segun Eubanks, Director of Center for Educational Innovation at University of Maryland, College Park, dated March 4, 2025.

19. Attached hereto as Exhibit 16 is the Declaration of Tiffany Dejaynes, Associate Professor of Education at Lehman College at the City University of New York, dated March 4, 2025.

20. Attached hereto as Exhibit 17 is the Declaration of Amanda Winkelsas, Clinical Associate Professor at State University of New York, dated March 5, 2025.

21. Attached hereto as Exhibit 18 is the Declaration of Kimber Wilkerson, Professor in the Department of Rehabilitation Psychology and Special Education at University of Wisconsin-Madison, dated March 4, 2025.

22. Attached hereto as Exhibit 19 is a copy of the National Center for Education Statistics, U.S. Department of Education, Press Release, *Most U.S. public elementary and secondary schools faced hiring challenges for the start of the 2024–25 academic year* (Oct. 17, 2024), available at [https://nces.ed.gov/whatsnew/press\\_releases/10\\_17\\_2024.asp](https://nces.ed.gov/whatsnew/press_releases/10_17_2024.asp) (last viewed Mar. 5, 2025).

23. Attached hereto as Exhibit 20 is the U.S. Department of Education’s internal directive titled, “Eliminating Discrimination and Fraud in Department Grant Awards,” signed by Acting Secretary Denise Carter on February 5, 2025, as published on social media app Bluesky (Prem Thakkar (@premthakker.bsky.social), Bluesky (Feb. 5, 2025, 2:08 p.m.)).

24. Attached hereto as Exhibit 21 is the U.S. Department of Education, Supporting Effective Educator Development Grant Program, Home, available at <https://www.ed.gov/grants-and-programs/teacher-prep/supporting-effective-educator-development-grant-program#home> (last viewed Mar. 5, 2025).

Dated: Boston, Massachusetts  
March 6, 2025

s/Adelaide Pagano

Adelaide Pagano  
Assistant Attorney General  
Office of the Attorney General  
Commonwealth of Massachusetts

**CERTIFICATE OF SERVICE**

I, Adelaide Pagano, certify that on March 6, 2025, I provided a copy of the forgoing document to individuals at the U.S. Department of Justice by electronic mail:

Alex Haas  
Co-Director, Federal Programs Branch  
[alex.haas@usdoj.gov](mailto:alex.haas@usdoj.gov)

Diane Kelleher  
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Rayford Farquhar  
Chief, Defensive Litigation, Civil Division  
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/s/ Adelaide Pagano  
Adelaide Pagano (BBO #690518)  
*Assistant Attorney General*